OSBORN LAW P.C.

Daniel A. Osborn, Esq. Lindsay M. Trust, Esq. 43 West 43rd Street, Suite 131 New York, New York 10036

Phone: 212-725-9800 Facsimile: 212-500-5115 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:_____
DATE FILED: 11/19/2021

Application GRANTED. SO ORDERED.

Dated: November 19, 2021

November 19, 2021

Att co an

VIA ECF

Honorable Stewart D. Aaron United States Magistrate Judge Southern District of New York 500 Pearl St. New York, NY 10007-1312

Re: Ortiz v. Commissioner of Social Security,

Civil Action No. 1:21-cv-01042-SDA

Dear Judge Aaron,

We write on behalf of plaintiff, Julissa Acosta Ortiz, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on November 22, 2021. Plaintiff respectfully requests an extension of time up to and including January 6, 2022. This is plaintiff's second request for an extension. This request is necessary because our office currently has twelve briefs due by November 29, 2021.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 6, 2022**;
- b. Defendant to file its response/cross-motion on or before March 7, 2022; and
- c. Plaintiff to file her reply (if any) on or before February 11, 2022.

Honorable Stewart D. Aaron November 19, 2021 Page 2

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn

OSBORN LAW, P.C.

43 West 43rd Street, Suite 131

New York, New York 10036

Telephone: 212-725-9800

Facsimile: 212-500-5115

dosborn@osbornlawpc.com

cc: Graham Morrison, Esq. (by ECF)